

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

AFRICAN IMMIGRANT RIGHTS
COUNCIL,

Plaintiff,

v.

UR JADDOU, et al.,

Defendants.

Case No. 8:24-cv-02584-LKG

**JOINT STATEMENT OF UNDISPUTED FACTS FOR
PURPOSES OF SUMMARY JUDGMENT**

African Immigrant Rights Council (the “Plaintiff”) and the United States Citizenship and Immigration Services (“USCIS” or the “Agency”) and USCIS Director Ur Jaddou (collectively, the “Defendants,” and together with Plaintiff, the “Parties”), respectfully submit this *Joint Statement of Undisputed Facts for Purposes of Summary Judgment*.

1. The FOIA request at issue was directed to USCIS.
2. Exhibit E is a copy of the FOIA request dated July 12, 2024.
3. In the FOIA request, Plaintiff requested a fee waiver.
4. USCIS granted the requested fee waiver.
5. Plaintiff’s FOIA request was for the following: “revised guidance to Asylum Officers to consider whether an asylum seeker could reasonably relocate to another part of the country of feared persecution when assessing claims of future persecution in all credible fear cases that was issued on May 9, 2024. This ‘revised guidance’ is mentioned in the May 9, 2024 DHS Press Release.”
6. Plaintiff filed the Complaint in this case on September 6, 2024.
7. USCIS produced Exhibit F on October 7, 2024.

8. Exhibit F is now publicly available on the USCIS public reading room. Plaintiff does not concede that USCIS has satisfied the requirements of §552(a)(2)(D).

Respectfully submitted,

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